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13 National Bank (incorrectly designated as
14 "American Express Company")*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 JAMES KU,

18 Plaintiff,

19 vs.

20 TRANSUNION, LLC, a Delaware limited
21 liability company; EQUIFAX INFORMATION
22 SERVICES, LLC, a Georgia limited liability
23 company; AMERICAN EXPRESS
24 COMPANY, a New York company; BANK OF
25 AMERICA, N.A., a national banking
association; BMW FINANCIAL SERVICES,
N.A., LLC, a Delaware limited liability
company; U.S. Department of Agriculture, a
government agency; and CAPITAL ONE
BANK (USA), N.A., a foreign corporation;

26 Defendants.

27 Case No.: 2:18-cv-01714-JCM-PAL

28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
AMERICAN EXPRESS NATIONAL
BANK TO FILE RESPONSE TO
PLAINTIFF'S COMPLAINT [DOC. #1]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JAMES KU ("Plaintiff" or "Mr. Ku"), by and through his attorneys, the law firm of MARX LAW FIRM, PLLC, and Defendant AMERICAN EXPRESS NATIONAL BANK (incorrectly designated in the Complaint as "American Express Company" and hereinafter referred to as "American Express"), by and through its attorneys, the law firm of Reid Rubinstein & Bogatz, that American Express shall have up to and including January 31, 2019 to file an Answer or otherwise respond to

...
...

1 Plaintiff's Complaint [Doc. No. 1], which was filed in this matter on September 7, 2018. This is
2 the first formal request for an extension, and it is made in good faith and not for the purposes of
3 delay.

4 Dated this 9th day of January, 2019.

5 REID RUBINSTEIN & BOGATZ

7 By: /s/ Jaimie Stilz, Esq.
8 I. Scott Bogatz, Esq.
Nevada Bar No. 3367
9 Jaimie Stilz, Esq.
Nevada Bar No. 13772
10 300 South Fourth Street, Suite 830
Las Vegas, Nevada 89101
11 *Attorneys for Defendant*
American Express National Bank

Dated this 9th day of January, 2019.

MARX LAW FIRM, PLLC

7 By: /s/ Bradley M. Marx, Esq.
8 Bradley M. Marx, Esq.
Nevada Bar No. 12999
601 S. 10th Street
Las Vegas, NV 89101
10 *Attorneys for Plaintiff*

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13
14 **ORDER**

15 IT IS SO ORDERED.

16 DATED this 14th day of January, 2019.

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20 UNITED STATES DISTRICT JUDGE
21 UNITED STATES MAGISTRATE JUDGE
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